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TO: U. S. Department of Transportation
Dockets Management Facility, Room PL-401
400 Seventh Street, SW
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FROM: Howard McCann, Ph. D., P. E.

This is to provide comments to **FHWA Docket No. FHWA-2001-11130.** 4

1) For urbanized areas, traffic control plans for significant projects on the Interstate System or other freeways should be incorporated into the "3C" planning process. Alternative traffic control plans for each project should be submitted for review, along with an impact analysis of each alternative. The impact analyses, for each alternative, should as a minimum include the following:
   a. Project costs (including the cost of traffic control)
   b. Worker safety
   c. Driver safety and delays
   d. Community costs.

2) Chapter 6B-01 of the Manual on Uniform Traffic Control Devices contains the Fundamental Principle (of temporary traffic control) that "The goal should be to route road users through such zones using roadway geometrics, roadside features, and temporary traffic control devices as nearly as possible comparable to those for normal highway situations." **It is important that this goal be closely followed, especially as it applies to the provision of shoulders on freeways.**

   AASHTO's *A Policy on Geometric Design of Highways and Streets* states, "Paved shoulders should be continuous on both the right and left sides of all freeway facilities." Yet, all to often, right and left shoulders are not provided on freeways during periods of construction. Consequently, motorists are funneled through sections where the right and left edge lines adjoin concrete barrier, and any breakdown can cause long delays.

   As stated in Tunnel Sections of AASHTO's *A Policy on Geometric Design of Highways and Streets*, "If shoulders are not provided, intolerable delays may result when vehicles become disabled during periods of heavy traffic." Also included is the statement that "Where it is not practical to provide shoulders in a tunnel, arrangements should be made for around-the-clock emergency service vehicles that can promptly remove any stalled vehicles."